

May 21, 2021

**VIA ELECTRONIC CASE FILING  
& ELECTRONIC TRANSMISSION**

**MEMO ENDORSED**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Walkie Check Productions, LLC* ["Walkie Check" or "Plaintiff"] v.  
*ViacomCBS Inc., Black Entertainment Television LLC d/b/a BET Networks, and*  
*BET Productions IV, LLC* ["Defendants"] (S.D.N.Y. Case No. 1:21-cv-01214-KPF)

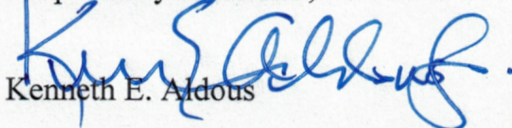
Dear Judge Failla:

We represent Plaintiff Walkie Check Productions, LLC in the above-referenced action and write, pursuant to Rule 9(C) of Your Honor's Individual Rules of Practice in Civil Cases (revised March 2, 2021), to seek leave to file under seal select documents and information related to Plaintiff's motion to disqualify Defendants' counsel.

The documents and information Plaintiff seeks to file under seal consist of confidential and/or privileged information that Plaintiff believes is necessary to present to the Court on its motion. In addition, in selecting the documents and/or information for proposed sealing, Plaintiff has attempted to limit the scope of its proposed sealing to that information that is necessary.

Thank you very much for your time and attention to this submission.

Respectfully submitted,

  
Kenneth E. Aldous

cc: Wook Hwang, Esq. (via electronic case filing & electronic transmission)

Application GRANTED. Plaintiff's motion to disqualify may be filed under seal, visible only to the Court and the parties.

SO ORDERED.

Dated: May 21, 2021  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE